

WILMER, CUTLER & PICKERING

2445 M STREET, N.W.

WASHINGTON, D.C. 20037-1420

TELEPHONE (202) 663-6000

FACSIMILE (202) 663-6363

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July 11, 2003

JUL 11 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

RE: WC Docket No. 03-157
In the Matter of Petition for Forbearance From the Current
Pricing Rules for the Unbundled Network Element Platform

Dear Ms. Dortch:

Enclosed for filing please find an original and four copies of Verizon's
Opposition to Request for Extension of Comment Period. I am also providing an additional copy
to be file-stamped and returned to me.

Please do not hesitate to contact me at 202.663.6083 should you have any
questions.

Sincerely,



Samir Jain

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
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the Unbundled Network Element)
Platform)

**OPPOSITION OF VERIZON TELEPHONE COMPANIES
TO REQUEST FOR EXTENSION OF COMMENT PERIOD**

The Verizon Telephone Companies (Verizon) hereby oppose the request filed by AT&T and other CLECs to extend the comment and reply comment periods by three weeks. *See* Request for Extension of Comment Period, WC Docket 03-157 (FCC filed July 8, 2003). As Verizon explained in detail in its Expedited Petition, the Commission's current pricing rules for UNE-P are causing significant and ongoing harm by deterring investment, impeding competition, failing to compensate incumbents fairly, and undermining economic growth. In view of these effects, the need for the relief sought in Verizon's petition is immediate.

The CLECs have failed to offer any reason for delay that comes close to overcoming this need for expedited relief. Verizon's petition raises a relatively narrow issue that does not require an extended comment period: whether the Commission should forbear from its current pricing rules for UNE-P, which simply would mean that the otherwise appropriate, already established pricing rules (i.e., compensation based on the resale pricing standard and per-minute access charges being paid to the ILEC) would apply. The Commission's comment period provides ample time to address this issue. Indeed, the Commission routinely allows approximately 20 days for comments in response to BOCs' 271 applications, which involve massive state records

and hundreds of issues, and here it has allowed an even longer comment period. Moreover, the parties are already very familiar with the factual and legal arguments in Verizon's petition since these issues (or similar issues) have been percolating before the Commission for years. Indeed, the CLECs' own request states that, in their view, they have previously responded to "many of the[] allegations" in Verizon's petition. *Id.* at 1. Therefore, the CLECs should be able to file comments well within the Commission's deadline.

Nor is the absence of a Final Order in the Triennial Review Proceeding cause for delay. Even if the Commission's Order addresses how some inputs to a TELRIC study should be determined, that discussion would not be pertinent to Verizon's petition. Verizon's petition does not ask the Commission to revisit or revamp the TELRIC rules themselves. Indeed, the Commission has indicated it plans to undertake a review of its TELRIC rules separately by issuing a rulemaking notice. Rather, Verizon's petition proposes steps the Commission should take immediately, for example by addressing whether the TELRIC rules should apply to UNE-P in the first place. Verizon's petition is separate and apart from any more general reform of the TELRIC rules that may occur in the Triennial Order or in the forthcoming rulemaking. Any clarifications or even changes to TELRIC that the Commission makes in its Triennial Order are therefore not germane to the questions raised in Verizon's petition.

The CLECs are the prime beneficiaries of the current uneconomic UNE-P pricing rules, and they should not be permitted to extend the period those rules remain in effect by delaying the completion of this proceeding.

CONCLUSION

For the foregoing reasons, the Commission should deny the request for an extension of the comment period.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Karen Zacharia", written over a horizontal line.

Of Counsel:
Michael E. Glover

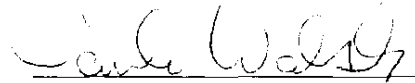
Karen Zacharia
Leslie V. Owsley
Donna M. Epps
Verizon
1515 North Court House Road
Fifth Floor
Arlington, Virginia 22201
(703) 351-3100

Lynn R. Charytan
Samir C. Jain
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420
(202) 663-6000

July 11, 2003

Certificate of Service

I, Carole Walsh, do hereby certify that, on this 11th day of July 2003, I caused copies of the foregoing Opposition to Request for Extension of Comment Period, to be served upon the parties on the attached service list by overnight carrier service.

A handwritten signature in cursive script, appearing to read "Carole Walsh", is written over a horizontal line.

Carole Walsh

Service List

Lawrence J. Lafaro
Chief Regulatory Counsel
AT&T Corp.
900 Route 202/206N
Bedminster, NJ 07921
(908) 532-1850

Russell C. Merbeth
Federal Policy Counsel
Birch Telecom
3213 Duke Street, #246
Alexandria, VA 22314

Francie McComb
Vice President, Regulatory Affairs
Talk America Inc.
6805 Route 202
New Hope, PA 18938
Tel. (215) 862-1517
Fax (215) 862-1085

Tom Koutsky
Z-Tel Communications, Inc.
1200 19th Street
Washington, DC 20036

Carol Ann Bischoff
Executive Vice President and
General Counsel
Competitive Telecommunications Association
1900 M Street, NW
Suite 800
Washington, DC 20036

Genevieve Morelli
Kelley Drye & Warren LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036
202-955-9600
Attorney for the PACE Coalition

Rebecca H. Sommi
VP Operations Support
Broadview Networks, Inc.
400 Horsham Road
Horsham, PA 19044
215-293-8715

Jason Oxman
Assistant General Counsel
Covad Communications Company
600 14th Street, N.W.
Suite 750
Washington, DC 20005
202-220-0400

Kimberly Scardino
Senior Counsel
MCI
1133 19th Street, NW
Washington, DC 20036
(202) 736-6478
Kimberly.scardino@mci.com

Robert W. McCausland
Vice President, Regulatory Affairs
Sage Telcom, Inc.
805 Central Expressway South
Suite 100
Allen, Texas 75103
Tel. (214) 495-4074
Fax (214) 495-4795